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K.C. HALM

February 6, 2006

VIA ELECTRONIC FILING

Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D. C. 20554

Re: Certification of CPNI Filing (February 6, 2006) of Charter Communications, Inc.; EB-06-TC-060, EB Docket No. 06-36

Dear Ms. Dortch:

Pursuant to the Commission's Public Notice, DA 06-223, released January 30, 2006, enclosed for filing in the above referenced docket please find an original electronic copy of the Certification of CPNI Filing (February 6, 2006) of Charter Communications, Inc. on behalf of the "Charter Carrier Entities" (as defined in the attached document).

Please contact me at the number listed above if you have any questions about this filing.

Sincerely

K.C. Halm

Enclosures

cc: Byron McCoy, Enforcement Bureau

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Before the FEDERAL COMMUNICATIONS COMMISSION WASHINGTON, DC 20554

CERTIFICATION OF CPNI FILING (FEBRUARY 6, 2006) OF CHARTER COMMUNICATIONS, INC.

EB-06-TC-060 / EB DOCKET NO. 06-36

Pursuant to the Public Notice issued by the Enforcement Bureau on January 30, 2006, DA 06-223, Charter Communications, Inc., on behalf of the "Charter Carrier Entities" (as defined hereafter), hereby files its compliance certificate required by Section 64.2009(e) of the Commission's rules.

As used in this Certification, the term "Charter Carrier Entities" shall mean any of Charter Communications, Inc.'s wholly-owned direct or indirect domestic subsidiaries that are telecommunications carriers subject to the requirements of the Communications Act of 1934, as amended.

Respectfully submitted,

John ID. Seiver

K.C. Halm

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Dated: February 6, 2006

CERTIFICATE OF COMPLIANCE

I, Ted Schremp, Senior Vice President of Charter Communications, Inc. ("Charter") hereby certify that I have personal knowledge that the Charter Carrier Entities¹ have established operating procedures that are adequate to ensure compliance with the Commission's rules governing use and disclosure of confidential proprietary network information ("CPNI"), as governed by 47 C.F.R. 64.2001, et. seq. Attached to this certificate is a statement explaining how the operating procedures of the Charter Carrier Entities ensure that they are in compliance with the Commission's CPNI rules.

Ted Schremp

Senior Vice President

Dated: February, 2006

¹ As used in this Certification, the term "Charter Carrier Entities" shall mean any of Charter Communications, Inc.'s wholly-owned direct or indirect domestic subsidiaries that are telecommunications carriers subject to the requirements of the Communications Act of 1934, as amended.

STATEMENT CONCERNING PROCEDURES ENSURING COMPLIANCE WITH CPNI REGULATIONS

The internal operating procedures and practices of the Charter Carrier Entities, as defined above, ensure that the Charter Carrier Entities comply with the FCC's rules at 47 C.F.R. § 64.2001, et. seq., governing the use of CPNI. Compliance with such rules is demonstrated by the policies, practices, training and audit procedures employed by the Charter Carrier Entities. Following is a brief explanation of the procedures the Charter Carrier Entities employ.

First, as to the use of CPNI for marketing purposes, Charter Carrier Entities do not use CPNI for the purpose of marketing service offerings among the different categories of service that the Charter Carrier Entities provide to subscribers. The Charter Carrier Entities do, however, use CPNI to market service offerings among the same category of service to which the customer already subscribes.

Second, the Charter Carrier Entities will only release or disclose CPNI to a third party pursuant to a valid request from law enforcement, the federal judiciary or other appropriate authority. For example, customer information will only be disclosed after the requesting party demonstrates that the request is made pursuant to a valid subpoena, court order, search warrant or national security letter.

Third, the Charter Carrier Entities will only release CPNI to third party vendors pursuant to a valid confidentiality agreement, and then only for the limited purpose of initiating, rendering, billing and/or collecting for services rendered to the subscribers of Charter Carrier Entities.

Fourth, the Charter Carrier Entities employ a variety of internal and external operating procedures to ensure compliance with CPNI regulations. Such procedures

include:

- A) The publication of a corporate privacy policy and CPNI-specific privacy policy on the Charter Communications website and circulation of that policy within the Charter Carrier Entities.
- B) Regular recurring staff and consultant training programs concerning federal, state and local legal requirements governing the use and disclosure of personally identifiable information, including CPNI.
- C) The implementation and administration of an employee disciplinary program used to ensure compliance with internal procedures. Such program includes a variety of different penalties for the violation of internal privacy procedures, including the termination of employment where appropriate.
- D) The use of an automated billing system that records each subscriber's individual privacy preferences at the initiation of service and allows for changes to those preferences as validly requested by the subscriber. This system enables Charter Carrier Entities to determine the status of a customer's CPNI approval prior to the use of CPNI.
- E) Physical and software based security systems limiting and tracking employee access to subscriber information in paper or electronic form, including CPNI.
- F) The maintenance of records of those occasions when CPNI is released to third parties (such release occurring only pursuant to valid request from law enforcement, the federal judiciary or other appropriate authority). The maintenance of records of sales and marketing campaigns that use Charter Carrier Entities subscriber's CPNI. Such records are retained for at least one year.
- G) The use of internal review processes to ensure that the release of subscriber list information is made only to persons using such information for the

purpose of publishing directories.

H) Notice to the FCC of those instances where opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

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